

M. Paul Wright
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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

JESSE JOE ORTIZ, SR.
108 S. Beverly St.
Crowley, TX 76036
SSN/ITIN: xxx-xx-3010

Case No. 16-44056-MXM-13

**MOTION TO REOPEN CHAPTER 13 CASE FOR THE PURPOSE OF
FILING DEBTORS MOTION FOR ENTRY OF DISCHARGE**

COMES NOW Debtor, **JESSE JOE ORTIZ, SR. AND PATRICIA SYLVIA ORTIZ**

requesting an order reopen their Chapter 13 bankruptcy case and reinstating the case to the court's active docket to allow Debtor to file their Motion for Entry of Discharge; and in support of said Motion would show the Court as follows:

3. Debtor has completed all the requirements under their Confirmed Plan and is eligible to receive their discharge. Their Motion for Entry of Discharge is ready to be filed as soon as the case is reopened.
4. For this reason, Debtor requests that her case be reopened to the court's active docket and allow Debtors counsel to file the Motion for Entry of Discharge.
5. This motion is not made for the purposes of delay and no creditor will suffer any prejudice if Debtors' motion is granted.

WHEREFORE, PREMISES CONSIDERED Debtor(s) JESSE JOE ORTIZ, SR. AND PATRICIA SYLVIA ORTIZ respectfully request the Court to reopen the Debtors' bankruptcy to the Court's active docket and give Debtors Attorney an opportunity to file Debtor's Motion for Entry of Discharge; and for such other relief the Court may grant.

Dated: April 14, 2022

Respectfully Submitted,

/s/ M. Paul Wright
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ATTORNEY FOR DEBTOR(S)

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on April 14, 2022, a true and correct copy of the foregoing was served on all parties in interest below via First Class Mail or ECF noticing where available.

Standing Chapter 13 Trustee

Tim Truman
6851 N.E. Loop 820, Suite 300
North Richland Hills, TX 76180

US Trustee – Electronic Notice

UST US Trustee
1100 Commerce St.
Room 976
Dallas, TX 75242-1496

Debtor

Ortiz, Sr., Jesse Joe
108 S. Beverly St.
Crowley, TX 76036

Parties In Interest

Conn Appliances, Inc
c/o Becket and Lee LLP
PO Box 3002
Dept Conns
Malvern, PA 19355-1245

Conn Appliances, Inc.
P.O. Box 2358
Beaumont, TX 77704

By: /s/ M. Paul Wright
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